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*Proposed Counsel for Daryl Fred Heller*

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

In re:

DARYL FRED HELLER,

Debtor.

Chapter 11

Case No. 25-11354 (JNP)

RELiance PLATINUM D/B/A RELIANCE  
FINANCIAL, a Florida Profit Limited Liability  
Company,

Adv. Pro. No.

Plaintiff/Counterclaim Defendant,

v.

PARAMOUNT MANAGEMENT GROUP,  
PARAMOUNT MANAGEMENT GROUP,  
LLC, HELLER CAPITAL GROUP, LLC,  
PARAMOUNT MGP LLC, PRESTIGE  
INVESTMENT GROUP, LLC, PREMIER  
MANAGEMENT GROUP, INC. D/B/A  
PREMIER MANAGEMENT GROUP,  
PRESTIGE FUND D, LLC, PRESTIGE FUND  
D V, LLC, PRESTIGE FUND B V, LLC, WF  
VELOCITY FUND V, LLC, PRESTIGE FUND  
D III, LLC, PRESTIGE FUND B IV, LLC,  
PRESTIGE FUND B, LLC, PRESTIGE FUN B  
II, LLC, SHARENET, LLC, PREMIER  
TECHNOLOGY GROUP, LLC AND DARYL  
HELLER,

Defendants/Counterclaim Plaintiffs.

**Removed from:**

IN THE CIRCUIT COURT OF THE  
SEVENTEENTH JUDICIAL CIRCUIT  
IN AND FOR BROWARD COUNTY,  
FLORIDA

CASE NO. CACE-24-011813

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE** that Daryl Fred Heller, the Chapter 11 debtor and debtor-in-

possession (the “Debtor”), in the bankruptcy case pending before the United States Bankruptcy Court for the District of New Jersey, by and through his proposed counsel McManimon, Scotland & Baumann, LLC, hereby respectfully removes the above-captioned action *Reliance Platinum LLC d/b/a Reliance Financial, a Florida Profit Limited Liability Company v. Paramount Management Group, Paramount Management Group, LLC, Heller Capital Group, LLC, Paramount MGP LLC, Prestige Investment Group, LLC, Premier Management Group, Inc. d/b/a Premier Management Group, Prestige Fund D, LLC, Prestige Fund D V, LLC, Prestige Fund B V, LLC, WF Velocity Fund V, LLC, Prestige Fund D III, LLC, Prestige Fund B IV, LLC, Prestige Fund B, LLC, Prestige Fun B II, LLC, Sharenet, LLC, Premier Technology Group, LLC and Daryl Heller*, CACE-24-011813, (the “Action”) and all claims and causes of action therein, from the Circuit Court of the Seventeenth Judicial Circuit In and For Broward County, Florida, to the United States Bankruptcy Court for the District of New Jersey, pursuant to Title 28 of the United States Code, Sections 1334(b) and 1452(a), Federal Rule of Bankruptcy Procedure 9027 and Local Rule of Bankruptcy Procedure 9027-1(a). The Debtor respectfully states as follows:

### **BACKGROUND**

1. On August 20, 2024, Reliance Platinum LLC d/b/a Reliance Financial, a Florida Profit Limited Liability Company (the “Plaintiff”), filed a Complaint commencing the Action against Paramount Management Group, Paramount Management Group, LLC, Heller Capital Group, LLC, Paramount MGP LLC, Prestige Investment Group, LLC, Premier Management Group, Inc. d/b/a Premier Management Group, Prestige Fund D, LLC, Prestige Fund D V, LLC, Prestige Fund B V, LLC, WF Velocity Fund V, LLC, Prestige Fund D III, LLC, Prestige Fund B IV, LLC, Prestige Fund B, LLC, Prestige Fun B II, LLC, Sharenet, LLC, Premier Technology Group, LLC and the Debtor (collectively, the “Heller Defendants”). The complaint seeks to

recover money regarding a breach of contract.

2. On November 27, 2024, the Heller Defendants filed an answer to the Plaintiff's Complaint and a Counterclaim.

3. On February 10, 2025, the Debtor filed a voluntary petition under Chapter 11 of Title 11 of the United States Code.

4. On February 19, 2025, the Plaintiff filed a Notice of Dismissal against the Debtor only due to the Debtor filing for bankruptcy.

5. This action is being removed because the Debtor holds a counterclaim.

### **BASIS FOR REMOVAL**

6. Removal of the Action is proper under Title 28 of the United States Code, Sections 1334(b) and 1452(a), Federal Rule of Bankruptcy Procedure ("Bankruptcy Rules") 9027 and Local Rule of Bankruptcy Procedure 9027-1(a) because the Action directly relates to claims against the Debtor and the value of certain unliquidated claims.

7. Under 28 U.S.C. § 1452, "[a] party may remove any claim or cause of action in a civil action other than a proceeding before the United States Tax Court or a civil action by a governmental unit to enforce such governmental unit's police or regulatory power, to the district court for the district where such civil action is pending, if such district court has jurisdiction of such claim or cause or cause of action under section 1334 of this title." 28 U.S.C. § 1452(a).

8. Pursuant to 11 U.S.C. § 1334(b), "[e]xcept as provided in subsection (e)(2), and notwithstanding any Act of Congress that confers exclusive jurisdiction on a court or courts other than the district courts, the district courts shall have original but not exclusive jurisdiction of all civil proceedings arising under title 11 or arising in or related to cases under title 11." 28 U.S.C. § 1334(b).

9. Further, Local Rule of Bankruptcy Procedural 9027-1(a) provides that “a party wishing to remove a claim or cause of action from a state or other federal court to the Bankruptcy Court shall file a “Notice of Removal” with the Clerk of the Bankruptcy Court.

10. In the present matter, the Action is “related to” Debtor’s bankruptcy proceeding because, as noted, the Action directly affects the claim in this bankruptcy case as well as the body of unsecured creditors in any plan.

11. Therefore, given that issues arising under the Action directly relate to the Debtor’s bankruptcy proceeding, there is a jurisdictional basis for removal to this Court.

**WHEREFORE**, the Debtor submits that the Action is properly removed and is now properly before the United States District Court for the District of New Jersey pursuant to Title 28 of the United States Code, Sections 1334(b) and 1452(a), Federal Rule of Bankruptcy Procedure 9027 and Local Rule of Bankruptcy Procedure 9027-1(a).

Respectfully,

**McMANIMON, SCOTLAND  
& BAUMANN, LLC**

*Proposed Counsel for Daryl Fred Heller, the  
Chapter 11 Debtor and Debtor-in-Possession*

By: /s/ Sari B. Placona  
Sari B. Placona

Dated: March 17, 2025